

**EASTERN PROFIT CORPORATION LIMITED'S  
TRIAL EXHIBIT LIST**

<b>Plaintiff Trial Ex. No.</b>	<b>Date</b>	<b>Description</b>	<b>Bates Range</b>	<b>Deposition Exhibit or Docket Number</b>	<b>Admitted / Objections</b>
*PX-1	12/29/2017	Research Agreement by and between Strategic Vision US LLC, as the Contractor, and Eastern Corporation, as the Client.	EASTERN-000005-009	Wallop 9; Waller 2; Wang 2; Han 11; C. Han 34;	X
*PX-2	Undated	Presentation titled "Time to Get Them: Beginning the Psycho-Political Campaign for China"	SVUS000385-402	Waller 2, Wallop 6	X
PX -3	INTENTIONALLY OMITTED				
PX -4	INTENTIONALLY OMITTED				
PX -5	INTENTIONALLY OMITTED				
*PX -6	12/2017	PowerPoint Presentation entitled Fish Tank for 10 People Only	SVUS001687-688	SV 112	X
*PX -7	12/2017	Presentation of Fifteen Subjects To Be Investigated by Strategic Vision under Research Agreement	SVUS000171-259	Wallop 7; Waller 6; Wang 12	X
*PX -8	12/2017	List of Fifteen Subjects To Be Investigated by Strategic Vision under Research Agreement	EASTERN-000020	SV 102	X
PX -9	INTENTIONALLY OMITTED				
PX -10	INTENTIONALLY OMITTED				

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PX -11	12/29/2017	Loan Agreement by and between ACA Capital Group Limited, as Lender, and Eastern Profit Corporation	EASTERN-000278-280	Wang 31; C. Han 35	<b>ADVANCE RULING REQUESTED</b> Rules 901, 402, 602: Objection as to authenticity and relevance. C. Han claimed to recognize his signature, but cannot read English (C. Han. Dep. 119:9-124:10), and could therefore not properly authenticate the rest of the document. C. Han claimed he did not tell Eastern about the document after it was signed (135:6-20), and did not keep a copy (134:21-24). No witness, including Wang, could explain how Eastern came to obtain the copy of the purported agreement during the litigation; it was not produced until after Eastern's first corporate representative deposition. ACA (the alleged counter-party to the purported loan agreement) evaded service of a deposition subpoena by having a director who was served in New Jersey resign her position a day before service of the subpoena. Strategic has been unable to locate William Je, the person who C. Han
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					claims personally negotiated and signed it.
PX-11 (cont.)					Further not relevant because Eastern had no means or plan for repayment of the \$1 million initial payment of even one month's agreed charge under the Research Agreement of \$750,000 over the multi-year term of the contract. Rules 1001-1004: Eastern is seeking to prove the contents of a document (that there is a loan) and has never produced an original or explained how the copy came into its possession.
*PX-12	01/02/2018	Wire Transfer Receipts Evidencing Payment of Deposit by ACA Capital Group Ltd.	EASTERN-000021-022	Wang 7	X
PX-13	INTENTIONALLY OMITTED				
PX-14	INTENTIONALLY OMITTED				
*PX-15	01/29/2018	Signal Messages Between J. Michael Waller and Yvette Wang	EASTERN-000250-275	Wallop 12; Waller 17	X
*PX-16	02/23/2018	Termination Letter from Anthony D. Mirenda of Foley Hoag LLP on behalf of Eastern Profit Corporation to French Wallop	EASTERN-000198-200	Wallop 13; Waller 8; Wang 6	X
*PX-17	08/30/2018	Limited Power of Attorney by and between Eastern Profit Corporation and Golden Spring (New York) Limited	EASTERN-000276-277	Guo 2; Maistrello 7; C. Han 32	X

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*PX-18	11/2017-01/2018	Handwritten Notes of J. Michael Waller	SVUS001762-1790	SV 106	X
*PX-19	12/2017-02/2018	French Wallop's Paper Calendar	SVUS002102-105	SV 111	X
*PX-20	09/2017-02/2018	Expense Receipts Produced by Strategic Vision	SVUS001976-991	SV 110	X
*PX-21	01/2018-05/2018	Georgetown Research LLC Citibank, N.A. Account Statements	SVUS001954-1960	SV 103	X
*PX-22	01/2018-01/2019	Strategic Vision US LLC Citibank, N.A. Account Statements	SVUS001907-938	SV 114	X
*PX-23	01/2018-01/2019	French Wallop's Hand-Written Notes Regarding Expenses	SVUS001939-953	SV 113	X
*PX-24	01/06/2018	Invoice from Georgetown Research LLC to Strategic Vision	SVUS001955	SV 104	X
*PX-25	02/09/2018	Invoice from J. Michael Waller to Georgetown Research LLC	SVUS001961-965	SV 107	X
*PX-26	02/20/2018	Invoice from Allied Special Operations Group LLC to Georgetown Research	SVUS000262-266	Wallop 16; Waller 13; SV 105	X
*PX-27	02/27/2018	Invoice from J. Michael Waller to Georgetown Research LLC	SVUS001966	SV 108	X
*PX-28	02/28/2018	Invoice from J. Michael Waller to Georgetown Research LLC	SVUS001972-1975	SV 109	X
*PX-29	04/16/2018	Invoice from Fletcher International Business Consultancy to Strategic Vision US LLC	SVUS000272-277	Wallop 17	X

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PX-30	05/27/2017	Article by William Gertz entitled China Intervenes to Block Businessman from Revealing Spying Secrets on VOA		Gertz 2	<b>ADVANCE RULING REQUESTED</b> Rules 901, 402, 602, 403. Objection: lacking in relevance, misleading, confusion of issues, lack of foundation, hearsay: the author of the article admitted in sworn testimony that he did not fully investigate Guo before writing the article and that he had taken \$100,000 from William Je (close associate of Guo), an action that caused his termination from a recognized conservative newspaper for violation of journalistic principles. <i>See</i> Gertz Depo., 178:6-14 (Gertz has never asked Guo about his actual birth date or early years in China); 86:3-87:20 (never asked details about Chinese officials' visits to his Sherry-Netherland apartment in May 2018); 87:20-88:4 (has never heard of Guo's statements expressing absolute faith in General Secretary Xi).

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PX-31	10/09/2017	Article by William Gertz entitled Dissident Reveals Secret Chinese Intelligence Plans Targeting U.S.		Han 2	<b>ADVANCE RULING REQUESTED</b> Rules 901, 402, 602, 403. Objection: lacking in relevance, misleading, confusion of issues, lack of foundation, hearsay: the author of the article admitted in sworn testimony that he did not fully investigate Guo before writing the article and that he had taken \$100,000 from William Je (close associate of Guo), an action that cause his termination from a recognized conservative newspaper for violation of journalistic principles. <i>See</i> Gertz Depo., 178:6-14 (Gertz has never asked Guo about his actual birth date or early years in China); 86:3-87:20 (never asked details about Chinese officials' visits to his Sherry-Netherland apartment in May 2018); 87:20-88:4 (has never heard of Guo's statements expressing absolute faith in General Secretary Xi).
PX-32	10/22/2017	Article in Wall Street Journal entitled China's Pursuit of Fugitive Businessman Guo Wengui Kicks Off Manhattan Caper Worthy of Spy Thriller		Han 4	X

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PX-33	10/25/2017	Article by William Gertz entitled Sessions Threatened to Quit Over Chinese Dissident		Gertz 3	<b>ADVANCE RULING REQUESTED</b> Rules 901, 402, 602, 403. Objection: lacking in relevance, including because the article makes reference to numerous subjects not at issue in the case (Jeff Sessions, etc.), misleading, confusion of issues, lack of foundation, hearsay: the author of the article admitted in sworn testimony that he did not fully investigate Guo and that he had taken \$100,000 from William Je (close associate of Guo), an action that cause his termination from a recognized conservative newspaper for violation of journalistic principles.
*PX-34	Undated	French Wallop LinkedIn Page	EASTERN-000017-019	Wallop 2	X
*PX-35	Undated	J Michael Waller LinkedIn Page	EASTERN-000013-016	Waller 4	X
*PX-36	11/28/2018	Strategic Vision US LLC's Responses and Objections to Eastern's First Set of Interrogatories	N/A	Wallop 19	X
*PX-37	01/23/2019	Strategic Vision US LLC's Supplemental and Amended Responses and Objections to Eastern's First Set of Interrogatories	N/A	Wallop 20; Waller 18	X
*PX-38	08/08/2019	Strategic Vision US LLC's Amended Answer and Counterclaims to Second Amended Complaint	N/A	Dkt. No. 127	X

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*PX-39	09/16/2019	Strategic Vision US LLC's Objections and Responses to Plaintiff's First Set of Requests for Admission	N/A	N/A	X
*PX-40	04/07/2020	Strategic Vision US LLC's L.R. 56.1 Statement	N/A	Dkt. No. 275	X
*PX-41	01/2018	Thumb drives delivered from Waller to Eastern	N/A	N/A	X

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PX-42	04/19/2017	Guo Wengui's VOA Interview on April 19, 2017  <a href="https://www.youtube.com/watch?v=-oEcKHtxeE">https://www.youtube.com/watch?v=-oEcKHtxeE</a>	N/A	N/A	Eastern had provided no translation of the interview at the deadline for making an objection, but subject to the translation, Strategic objects under Rule 801 (hearsay, and not a prior consistent statement because was not made before allegations of recent fabrication or improper motive), and Rule 602 (lack of personal knowledge for Guo's statements about others). Upon review of the translation, some statements may be admissible against Eastern under Rule 801(2) (A) through (D). Further, Strategic's Interrogatory 18, propounded in 2018 and answered under oath December 20, 2018 by Eastern, asked Eastern to disclose in discovery any documents it intended to use in "responding to any of Strategic Vision's counterclaims, allegations, denials or defenses." Eastern failed to produce the document in discovery and also failed to provide the document in any Rule 26 disclosure.
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PX-43	04/19/2017	PRC Ministry of Foreign Affairs Press Release re Spokesperson Lu Kang's Regular Press Conference referring to Interpol issuance of Red Notice on Guo	N/A	N/A	Rule 801 (hearsay) and non-disclosure in discovery (see objection to PX-42).
PX-44	05/23/2017	Article in Wall Street Journal by Sasha Gong entitled How China Managed to Muffle the Voice of America	N/A	N/A	Rule 602 (lack of personal knowledge on some of Gong's statements); Rule 801 (hearsay on some of Gong's statements); non-disclosure in discovery (see objection to PX-42).

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PX-45	Undated	Sasha Gong letter in support of Guo's asylum application	N/A	N/A	Rule 602 (lack of personal knowledge on some of Gong's statements); Rule 801 (hearsay on some of Gong's statements). Lianchao Han, acting as Guo's attorney and acting with other Guo attorneys, modified Gong's initial draft in March 2018 to add information that only they had, and that were hearsay and not based on Gong's personal knowledge. For example, Gong agreed to Lianchao Han's suggestion, on Guo's behalf, that she minimize the degree of Guo's work for the Chinese MSS, even though Guo's own statements to Gong later showed that Guo had indeed worked directly with the MSS. Non-disclosure in discovery (see objection to PX-42).
PX-46	04/15/2018	Washington Times Op-Ed by Sasha Gong entitled How Working as A Chinese Language Reporter Holds Particular Peril for Natives of Communist China	N/A	N/A	Rule 602 (lack of personal knowledge on some of Gong's statements); Rule 801 (hearsay on some of Gong's statements). Non-disclosure in discovery (see objection to PX-42).

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PX-47	05/25/2018	Tibet.net Op-Ed by Sasha Gong entitled Spineless Federal Bureaucrats Caved to Chinese Pressure to Censor Voice of America. Now They Deny It	N/A	N/A	Rule 602 (lack of personal knowledge on some of Gong's statements); Rule 801 (hearsay on some of Gong's statements). Non-disclosure in discovery (see objection to PX-42).

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PX-48	10/26/2018	Guo Wengui interview with Kyle Bass  <a href="https://www.realvision.com/exiled-chinese-billionaire-tells-all">https://www.realvision.com/exiled-chinese-billionaire-tells-all</a>	N/A	N/A	Rule 602 (lack of personal knowledge for many of Guo's statements); Rule 801 (hearsay regarding many of Guo's statements, and they are not prior consistent statements because they were made while this case was pending in 2018, not before allegations of recent fabrication or improper motive). However, some statements may be admissible against Eastern under Rule 801(2) (A) through (D). This includes Guo's false claim to have come to America to warn the country about the threat posed by the CCP, in the first few minutes; his claim to have already received asylum at minute 6; his statements about China's use of Hong Kong and New York Bank of China buildings as spy and money laundering operations at minutes 18-20; his statements about cyber control at minute 30;

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PX-48 (cont.)					his refusal to criticize President Xi at minutes 37-38; his claim at minutes 39-40 to know Xi's predecessor, Hu Jintao, very well; and his claim to be friends with Meng Hongwei, former Interpol president from 2016-2018, at 52. Aside from Guo's occasional admissions, much of the video is led or coached by Kyle Bass, an associate of Guo's, and covers the Chinese economy and business, irrelevant under Rule 402. Non-disclosure in discovery (see objection to PX-42).
*PX-49	11/24/2018	Daily Caller Op-Ed by Sasha Gong entitled The Funny Business of Interpol's "Red Notice"	N/A	N/A	X
PX-50	12/08/2018	Daily Caller Op-Ed by Sasha Gong entitled A Former RNC Finance Chair and His Role in Malaysia's Development Fund Scandal	N/A	N/A	Rule 602 (this is an opinion piece by Gong and not based on her personal knowledge); Rule 801 (relatedly, it is hearsay and it is not even clear who the sources are); Rule 402 (relevance); Non-disclosure in discovery (see objection to PX-42).

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*PX-51	12/19/2018	National Post (Canada) Op-Ed by Sasha Gong entitled No One, Rich or Poor, Tourist or Local, Can Escape China's Surveillance State	N/A	N/A	X
PX-52A	2017-2018	Compilation of Guo Anti-CCP video clips <sup>1</sup>	N/A	N/A	Objection: Eastern had provided no translation of the interview at the deadline for making an objection, but subject to the translation, Strategic objects under Rule 801 (hearsay, and not a prior consistent statement because was not made before allegations of recent fabrication or improper motive), and Rule 602 (lack of personal knowledge for Guo's statements about others). Upon review of the translation, some statements may be admissible against Eastern under Rule 801(2) (A) through (D); non-disclosure in discovery (see objection to PX-42).

<sup>1</sup> Video clips are taken from the following sources: 6/30/2017 [https://www.youtube.com/watch?v=4hqD4sH7\\_Ig&feature=youtu.be](https://www.youtube.com/watch?v=4hqD4sH7_Ig&feature=youtu.be) (at 36 min, 0 sec); 9/10/2017 <https://www.youtube.com/watch?v=EOk2QpE4aAU> (at 6 min, 30 sec); 5/10/2018 <https://www.youtube.com/watch?v=xlCHl3lEuo4> (at 49 min 30 sec); 5/24/2018 <https://www.youtube.com/watch?v=KBAqPuZGyqI&t=4s> (at 9 min 40 sec); 6/2/2018 [https://www.youtube.com/watch?v=LK1Vj5\\_jNu8](https://www.youtube.com/watch?v=LK1Vj5_jNu8) (at 26 min 10 sec); 6/17/2018 <https://www.youtube.com/watch?v=WDaZbqehBKU&t=82s> (at 23 min 40 sec); 7/9/2018 <https://www.youtube.com/watch?v=cIB8JQTqYao> (at 41 min 08 sec); 7/17/2018 <https://youtu.be/VFfrqUyGvmA> (at 1:27:18 -1:27:43 and <https://www.youtube.com/watch?v=znAILSjv0rs> (at 2 hr 40 min); 8/5/2018 <https://www.youtube.com/watch?v=Vuxt8K4Wm0E> (at 1 hr 49 min 52 sec); 8/16/2018 <https://www.youtube.com/watch?v=iLNve3suG-A> (at 42 min 20 sec);

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PX-52B	Undated	Certified Translation of PX-52A			Objection: Eastern had provided no translation of the interview at the deadline for making an objection, but subject to the translation, Strategic objects under Rule 801 (hearsay, and not a prior consistent statement because was not made before allegations of recent fabrication or improper motive), and Rule 602 (lack of personal knowledge for Guo's statements about others). Upon review of the translation, some statements may be admissible against Eastern under Rule 801(2) (A) through (D); non-disclosure in discovery (see objection to PX-42).

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8/20/2018 <https://www.youtube.com/watch?v=NHBgM2o5nFw> (at 22 min 40 sec); 8/23/2018 <https://www.youtube.com/watch?v=YwL0WHo1L88&t=201s> (at 1 hr 52 min 25 sec); 8/24/2018 <https://www.youtube.com/watch?v=DGanIrNmZ-A> (at 30 min 45 sec).

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PX-53	2017-2018	List of web sources for compilation of Guo Anti-CCP video clips	N/A	N/A	Objection: Eastern had provided no translation of the interview at the deadline for making an objection, but subject to the translation, Strategic objects under Rule 801 (hearsay, and not a prior consistent statement because was not made before allegations of recent fabrication or improper motive), and Rule 602 (lack of personal knowledge for Guo's statements about others). Upon review of the translation, some statements may be admissible against Eastern under Rule 801(2) (A) through (D); non-disclosure in discovery (see objection to PX-42).

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PX-54	08/19/2019	Twitter Safety article entitled Information Operations Directed at Hong Kong	N/A	N/A	Objection: Rule 602, 701, 801 (hearsay; these purport to be online Twitter statements regarding a special analysis Twitter performed about Chinese cyber operations against Hong Kong in August 2019, but Twitter is unavailable to answer questions about its data collection and conclusions, and we cannot question the individuals who ran the underlying accounts on which it reports ); Rule 402-403 (relevance; China's cyber operations against Hong Kong in 2019-2020 are not relevant to the issues in the case, or if they are, any relevance is outweighed by the possibility of confusion and waste of time); non-disclosure in discovery (see objection to PX-42).

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PX-55	08/00/2019	Twitter Data Set 1, "Tweet Information," released August, 2019, excerpted from, and available at: <a href="https://transparency.twitter.com/en/reports/information-operations.html">https://transparency.twitter.com/en/reports/information-operations.html</a>	N/A	N/A	Objection: Rule 602, 701, 801 (hearsay; these purport to be online Twitter statements regarding a special analysis Twitter performed about Chinese cyber operations against Hong Kong in August 2019, but Twitter is unavailable to answer questions about its data collection and conclusions, and we cannot question the individuals who ran the underlying accounts on which it reports ); Rule 402-403 (relevance; China's cyber operations against Hong Kong in 2019-2020 are not relevant to the issues in the case, or if they are, any relevance is outweighed by the possibility of confusion and waste of time); non-disclosure in discovery (see objection to PX-42).

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PX-56	08/00/2019	Twitter Data Set 2, "Tweet Information," released August, 2019, excerpted from, and available at: <a href="https://transparency.twitter.com/en/reports/information-operations.html">https://transparency.twitter.com/en/reports/information-operations.html</a>	N/A	N/A	Objection: Rule 602, 701, 801 (hearsay; these purport to be online Twitter statements regarding a special analysis Twitter performed about Chinese cyber operations against Hong Kong in August 2019, but Twitter is unavailable to answer questions about its data collection and conclusions, and we cannot question the individuals who ran the underlying accounts on which it reports ); Rule 402-403 (relevance; China's cyber operations against Hong Kong in 2019-2020 are not relevant to the issues in the case, or if they are, any relevance is outweighed by the possibility of confusion and waste of time); non-disclosure in discovery (see objection to PX-42).

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PX-57	10/00/2019	Australian Strategic Policy Institute - International Cyber Policy Centre Issues Paper Report entitled Tweeting through the Great Firewall	N/A	N/A	Objection: Rule 602, 701, 801 (lack of personal knowledge, opinion, and hearsay; this purports to be an opinion by a third party about whether and why the PRC staged an obvious, blunt-force Twitter campaign against Guo focused on April 2017, but continuing into July 2019); Rule 402-403 (relevance; China's blunt-force, uncovered cyber operations are not relevant unless the reason for engaging in the operations is known; if this is an obvious government-run operation, as the article opines, was it performed in order to actually sway opinion, or was it undertaken to provide cover for Guo and build the story that he is a dissident as he launched his U.S. media campaign? The article cannot and does not try to answer this question. Further, its authors created the document post-lawsuit and it makes numerous factual errors in its quick background sketch on Guo, likely gleaned from second or third-hand sources); non-disclosure in discovery (see objection to PX-42).
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PX-58	06/00/2020	Australian Strategic Policy Institute - International Cyber Policy Centre Policy Brief entitled Retweeting through the Great Firewall	N/A	N/A	Objection: Rule 602, 701, 801 (lack of personal knowledge, opinion, and hearsay; this purports to be an opinion by a third party about whether and why the PRC staged an obvious, blunt-force Twitter campaign against Guo into July 2019 and 2020); Rule 402-403 (relevance; China's blunt-force, uncovered cyber operations in 2019-2020 are not relevant unless the reason for engaging in the operations is known; if this is an obvious government-run operation, as the article opines, was it performed in order to actually sway opinion, or was it undertaken to provide cover for Guo and build the story that he is a dissident as he launched his U.S. media campaign? The article cannot and does not try to answer this question. Further, its authors created the document post-lawsuit and it makes numerous factual errors in its quick background sketch on Guo, likely gleaned from second or third-hand sources); non-disclosure in discovery (see objection to PX-42).
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PX-59	06/17/2020	Stanford Internet Observatory Cyber Policy Center report entitled Sockpuppets Spin COVID Yarns: An Analysis of PRC-Attributed June 2020 Twitter Takedown	N/A	N/A	Objection: lack of authentication in that the Thiel "Authenticity Certification" (executed in November 2020 but not disclosed to Strategic until April 8, 2021) attempts to overcome the hearsay rule by being a business record. However, the report is not a business record that can be authenticated through a custodian in the manner Eastern attempts with the "Certification." The report was not, for example, a report prepared in the ordinary course of the center's operations and made contemporaneous with the events it describes. The "Certification" attempts to provide foundation for admission at trial without the appearance of an appropriate witness. Rule 602, 701, 801 (lack of personal knowledge, opinion, and hearsay; this purports to be an opinion by a third party about whether the PRC staged an obvious, blunt-force Twitter campaign against Guo focused in 2019-2020); Rule 402-403 (relevance; China's blunt-force, uncovered cyber operations in 2019-2020
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					are not relevant unless the reason for engaging in the operations is known; if this is an obvious government-run operation, as the article opines, was it performed in order to actually sway opinion, or was it undertaken to provide cover for Guo and build the story that he is a dissident as he launched his U.S. media campaign? The article cannot and does not try to answer this opinion. Further, its authors created the document post-lawsuit and it makes some factual errors in its quick background sketch on Guo, likely gleaned from second or third-hand sources); non-disclosure in discovery (see objection to PX-42).

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PX-60	08/17/2020	Criminal Information-United States v. Nickie Mali Lum Davis, CR.No. 20-00068	N/A	N/A	Objection: Rule 602, 801, 402 and 403 (all of these statements are allegations that purport to be based on statements of non-witnesses, and they are being offered to prove that the PRC actually tried to force the deportation of Guo in May of 2017 through US agents, which Eastern will argue proves that Guo was a true dissident. However, the key issue is whether the PRC actually wanted and intended to execute the alleged plan, which came nowhere close to fruition, and not even the individuals whose hearsay is cited in this document could testify as to the PRC's true plan. Further, Guo made statements pledging loyalty to Xi Jinping even after this supposed plan).

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PX-61	08/31/2020	US DOJ Press Release re Nickie Mali Lum Davis guilty plea	N/A	N/A	Objection: Rule 602, 801, 402 and 403 (all of these statements are allegations that purport to be based on statements of non-witnesses, and they are being offered to prove that the PRC actually tried to force the deportation of Guo in May of 2017 through US agents, which Eastern will argue proves that Guo was a true dissident. However, the key issue is whether the PRC actually wanted and intended to execute the alleged plan, which came nowhere close to fruition, and not even the individuals whose hearsay is cited in this document could testify as to the PRC's true plan. Further, Guo made statements pledging loyalty to Xi Jinping even after this supposed plan).

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PX-62	10/06/2020	Criminal Information – United States v. Elliott Broidy, CR No.1:20-cr-00210	N/A	N/A	Objection: Rule 602, 801, 402 and 403 (all of these statements are allegations that purport to be based on statements of non-witnesses, and they are being offered to prove that the PRC actually tried to force the deportation of Guo in May of 2017 through US agents, which Eastern will argue proves that Guo was a true dissident. However, the key issue is whether the PRC actually wanted and intended to execute the alleged plan, which came nowhere close to fruition, and not even the individuals whose hearsay is cited in this document could testify as to the PRC's true plan. Further, Guo made statements pledging loyalty to Xi Jinping even after this supposed plan).
*PX-63	04/19/2017	Reuters Staff article entitled China Says Interpol “Red Notice” Issued for Tycoon Guo Wengui	N/A	N/A	X

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PX-64	09/20/2017	Forbes article by Nathan Vardi entitled Chinese Fugitive Tycoon Guo Wengui Beats Hedge Fund in U.S. Court As \$88 Million Lawsuit Tossed	N/A	N/A	Objection: Rule 602, 701, 801 (lack of personal knowledge, opinion, and hearsay; this contains numerous statements for which the source and speaker is not clear, and insinuates without directly stating that the PAX lawsuit was a failed PRC-inspired effort to punish Guo, when in fact the case is continuing, the docket would show that the case has merit and Guo has been sanctioned).
*PX-65	10/06/2017	Walls Street Journal article by Cezary Podkul, Kate O'Keeffe and Aruna Viswanatha entitled U.S. Confronts China Over Suspected Cyberattack as Fugitive Guo Wengui Appears in Washington	N/A	N/A	X
*PX-66	11/03/2017	Marco Rubio Questions the block of Guo Wengui's Facebook Account (YouTube Video) <a href="https://www.youtube.com/watch?v=8A3r8LA17kE">https://www.youtube.com/watch?v=8A3r8LA17kE</a>			X
*PX-67	04/19/2018	New York Times article by David D. Kirkpatrick and Mark Mazzetti entitled Seeking Foreign Money, G.O.P. Donor Pushed for Trump to Golf With Malaysian Premier	N/A	N/A	X
*PX-68	04/23/2018	Financial Times article by Lucy Hornby entitled China Accuses Exiled Guo Wengui of US Campaign Donations	N/A	N/A	X
*PX-69	02/25/2018	Guo tweet, with certified translation	N/A	N/A	X

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PX-70A	07/17/2018	Guo video clip <sup>2</sup>	N/A	N/A	Objection: Eastern had provided no translation of the interview at the deadline for making an objection, but subject to the translation, Strategic objects under Rule 801 (hearsay, and not a prior consistent statement because was not made before allegations of recent fabrication or improper motive). Upon review of the translation, some statements may be admissible against Eastern under Rule 801(2) (A) through (D). Further, Strategic's Interrogatory 18, propounded in 2018 and answered under oath December 20, 2018 by Eastern, asked Eastern to disclose in discovery any documents it intended to use in "responding to any of Strategic Vision's counterclaims, allegations, denials or defenses." Eastern failed to produce the document in discovery and also failed to provide the document in any Rule 26 disclosure. Finally, the clip consists of a few seconds from the middle of a wide-ranging,
PX-70A (cont.)					3-hour statement Guo gave on his own

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					controlled station, and so before entertaining any admission of these few seconds, the full translation and clip should be provided for context.

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<sup>2</sup> Clip was taken from video posted at: <https://www.youtube.com/watch?v=znAILSjv0rs>

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PX-70B	Undated	Certified translation of PX-70A.	N/A	N/A	Objection: Eastern had provided no translation of the interview at the deadline for making an objection, but subject to the translation, Strategic objects under Rule 801 (hearsay, and not a prior consistent statement because was not made before allegations of recent fabrication or improper motive). Upon review of the translation, some statements may be admissible against Eastern under Rule 801(2) (A) through (D). Further, Strategic's Interrogatory 18, propounded in 2018 and answered under oath December 20, 2018 by Eastern, asked Eastern to disclose in discovery any documents it intended to use in "responding to any of Strategic Vision's counterclaims, allegations, denials or defenses." Eastern failed to produce the document in discovery and also failed to provide the document in any Rule 26 disclosure. Finally, the clip consists of a few seconds from the middle of a wide-ranging,
PX-70B (cont.)					3-hour statement Guo gave on his own

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					controlled station, and so before entertaining any admission of these few seconds, the full translation and clip should be provided for context.
PX-71	10/20/2020	Elliot Broidy Guilty Plea - United States v. Elliott Broidy, CR No.1:20-cr-00210	N/A	N/A	Objection: Rule 602, 801, 402 and 403 (all of these statements are allegations that purport to be based on statements of non-witnesses, and they are being offered to prove that the PRC actually tried to force the deportation of Guo in May of 2017 through US agents, which Eastern will argue proves that Guo was a true dissident. However, the key issue is whether the PRC actually wanted and intended to execute the alleged plan, which came nowhere close to fruition, and not even the individuals whose hearsay is cited in this document could testify as to the PRC's true plan. Further, Guo made statements pledging loyalty to Xi Jinping even after this supposed plan).

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PX-72	08/31/2020	Nicki Mali Lum Davis Guilty Plea - United States v. Nickie Mali Lum Davis, CR.No. 20-00068	N/A	N/A	Objection: Rule 602, 801, 402 and 403 (all of these statements are allegations that purport to be based on statements of non-witnesses, and they are being offered to prove that the PRC actually tried to force the deportation of Guo in May of 2017 through US agents, which Eastern will argue proves that Guo was a true dissident. However, the key issue is whether the PRC actually wanted and intended to execute the alleged plan, which came nowhere close to fruition, and not even the individuals whose hearsay is cited in this document could testify as to the PRC's true plan. Further, Guo made statements pledging loyalty to Xi Jinping even after this supposed plan).